

D. G. SWEIGERT, C/O, MAILBOX, PMB 13339  
514 Americas Way, Box Elder, SD 57719  
[Spoliation-notice@mailbox.org](mailto:Spoliation-notice@mailbox.org)

October 19, 2023

*Sweigert v. Goodman*, 23-cv-05875-JGK

Honorable John G. Koeltl  
U.S. District Judge  
U.S. District Court  
for the Southern District of New York  
500 Pearl Street, New York, N.Y. 10007  
Via ECF filing

SUBJ: Letter motion seeking leave of the Court pursuant to FRCP 15(d)

Your Honor,

1. The undersigned *pro se* Plaintiff has received a Rule 11 Safe Harbor demand (see below) from Defendant Jason Goodman. The Rule 11 e-mail notification, with the accompanying attachments, chiefly complains about issues that can be cleared up with facts that have occurred since the filing of the Amended Complaint ECF no. 13. Recent examples (after docketing the Amended Complaint) of Mr. Goodman's tortious social media behavior fall within the scope of the Amended Complaint, no new allegations will be presented. This will clarify the issues at hand and serve to conserve judicial resources.
2. To satisfy Mr. Goodman's request to more completely clarify issues, the Plaintiff seeks thirty (30) days to fashion a supplemental complaint pursuant to FRCP Rule 15(d) to be docketed as the Court directs.

From: Jason Goodman <truth@crowdsourcethetruth.org>  
To: David George Acton Sweigert <spoliation-notice@mailbox.org>  
Date: 10/16/2023 8:33 PM PDT  
Subject: URGENT This is your 21 day safe harbor notification a motion for sanctions pursuant to FRCP Rule 11 may be filed against you

Mr. Sweigert,

Please see the attached copy of the Notice of Motion for Sanctions, Memorandum in Support, and accompanying exhibits that I intend to file in this matter. Pursuant to Federal Rule of Civil Procedure 11(c)(2), you have 21 days to consider this motion and decide whether to withdraw your Amended Complaint and cease and desist from future vexatious litigation and other harassment. If you do not agree to withdraw your Amended Complaint cease and desist, I will plan to file the sanctions motion pursuant to Rule 11.

Thank you

From: Jason Goodman <truth@crowdsourcethetruth.org>  
To: David George Acton Sweigert <spoliation-notice@mailbox.org>  
Cc: "spoliation@posteo.net" <spoliation@posteo.net>  
Date: 10/17/2023 7:41 AM PDT  
Subject: Re: URGENT This is your 21 day safe harbor notification a motion for sanctions pursuant to FRCP Rule 11 may be filed against you

You have 21 days to rectify the defects in your case. You have been ordered to cease and desist from harassing me. The fact that you sent me this today rather than withdrawing the case is an indication that you have no intention to cure the defects in your defective, malicious case. If this is how you intend to handle the rule 11 motion, you should prepare to be sanctioned. Do not email me ever again. Withdraw the case, cease and desist from all contact or the rule 11 sanctions will be just the first legal penalty you will suffer.

Respectfully, Signed 10/19/2023



**D.G. SWEIGERT, PRO SE PLAINTIFF**

### **CERTIFICATE OF SERVICE**

Hereby certified that a PDF copy of this letter has been sent via electronic mail to:

Jason Goodman, sole stockholder of MULTIMEDIA SYSTEM DESIGN, INC.

[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

Certified under penalties of perjury.

Respectfully, Signed this October 19<sup>th</sup>, 2023 (10/19/2023)



**PRO SE DEFENDANT**